


FILED

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

FEB 20 2024  
 CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 BY   
 DEPUTY CLERK

United States of America )

v. )

Sergio Ivan Hernandez-Lopez )  
 Eddie Guillermo Jacobo )  
 Hector Joel Martinez-Gonzalez )

Case No.

EP-24-M-726-BFC(1)(2)(3)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Febraury 16, 2024 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21 USC 841 (a)(1)

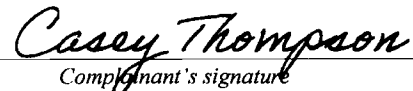
Possession with intent to Distribute 4.4 kilograms of methamphetamine

This criminal complaint is based on these facts:

See attached Affidavit, which is marked "Attachment A"

☒ Continued on the attached sheet.

Oath Telephonically Sworn  
 At 1:11 PM  
 Fed.R.Crim.P.4.1(b)(2)(A)

  
 Complainant's signature

Casey Thompson, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/20/2024City and state: El Paso, Texas


Judge's signature

Robert F. Castenda, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT "A"**

On February 16, 2023, at approximately 9:00 a.m., members of the Organized Crime Drug Enforcement Task Force (OCDETF) Strike Force 3 established surveillance in the vicinity of a shopping store located at 9817 Dyer St., El Paso, Texas 79924. Agents established surveillance in an effort to observe a planned meet between an Undercover agent (UC) and a yet to be identified individual. Prior to the meet, the UC had been tasked to receive a load of illegal drugs in El Paso, Texas and transport the illegal drugs to Chicago, Illinois for further distribution. The UC was also told that the Drug Trafficking Organization (DTO) would be sending an unknown individual to ride with the UC to Chicago, Illinois, so that the unidentified individual can transport the illegal drug proceeds back to El Paso, Texas from Chicago, Illinois. Shortly thereafter, the UC was contacted by Sergio Ivan HERNANDEZ-Lopez, (hereafter referred to as HERNANDEZ-Lopez) who was utilizing mobile number 915-288-0960. HERNANDEZ-Lopez had advised the UC that he had arrived at the aforementioned location. Furthermore, the UC asked HERNANDEZ-Lopez if he was only bringing the unknown individual who was to ride with the UC to Chicago, Illinois or if he had the "motors" with him as well. When using the word "motors", the UC was referring to the illegal narcotics. HERNANDEZ-Lopez then advised the UC that he had everything with him. Also, HERNANDEZ-Lopez advised the UC that he was operating a white in color Chrysler Pacifica vehicle.

At approximately 10:40 a.m., agents observed a white color Chrysler Pacifica bearing New Mexico registration 383PFD arrive at the aforementioned location and parked next to a grey color Chevrolet Malibu bearing Mexican Registration B30SDP1. Subsequently, agents observed a Hispanic Male later identified as Eddie Guillermo JACOBO (hereafter referred to as JACOBO) exit the Chrysler Pacifica passenger side while holding a black backpack and enter the Chevrolet Malibu on the passenger side.

Shortly thereafter, the Chrysler Pacifica followed by the Chevrolet Malibu drove through the parking lot arriving where the UC was standing in front of the Family Dollar and park side by side. Agents observed the UC approach the driver side of the Chrysler Pacifica which was being driven by HERNANDEZ-Lopez.

Subsequently, agents observe JACOBO exit the Chevrolet Malibu, placed the black back pack on his back, retrieved what appeared to be a large box wrapped in a black trash bag from the rear passenger seat of the vehicle. JACOBO then walked in between the Chevrolet Malibu and the Chrysler Pacifica. Agents then observed the driver of the Chevrolet Malibu, a Hispanic male with long black hair, later identified as Hector Joel MARTINEZ-Gonzalez (hereafter referred to as MARTINEZ-Gonzalez) exit the vehicle. Agents observed MARTINEZ-Gonzalez take a photograph of JACOBO holding the large box wrapped in a trash bag.

Shortly thereafter, the UC confirmed the presence of the illegal narcotics at which point DEA agents arrested HERNANDEZ-Lopez, JACOBO and MARTINEZ-Gonzalez. At the time of arrest, JACOBO was holding the box where agents suspected the illegal narcotics to be located.

Subsequently, a canine sniff of the box resulted in a positive alert for the presence of illegal narcotics. Agents then opened the box which revealed 5 rectangular shaped bundles wrapped in black tape. Agents opened 4 bundles which revealed a white crystallized substance. Agents conducted a field test of the white crystallized substance which tested positive for the characteristics of methamphetamine, weighed approximately 4.4 kilograms. Agents also opened the last bundle which revealed multiple blue pills. Agent did not perform a field test of the blue pills. Agents know based on training and experience along with communication between the UC and Target that these pills are suspected fentanyl. The suspected fentanyl weighed approximately 600 grams.

Agents conducted custodial interviews of HERNANDEZ-Lopez, JACOBO and MARTINEZ-Gonzalez. All three suspects agreed both verbally and in writing to speak to agents without an attorney present. Additionally, all three subjects agreed verbally and in writing to give agents consent to search the contents of their phones.

During the interview of HERNANDEZ-Lopez, HERNANDEZ-Lopez told agents he was asked to pick up JACOBO at the Paseo Del Norte Port of Entry and drive him to the Food King located at 9817 Dyer St, El Paso, Texas. At this location, JACOBO received a box from MARTINEZ-Gonzalez. HERNANDEZ stated that he knew he was involved in something illegal, but wasn't sure with what exactly. HERNANDEZ admitted to agents he was involved in human trafficking.

During the interview of JACOBO, JACOBO told agents he was not aware the box contained illegal narcotics. JACOBO stated he was asked by his aunt who resides in Juarez, Mexico to pick up approximately \$40,000.00 USC in Chicago, IL. JACOBO stated that he was told he would be paid \$3,000.00 USC to pick up the cash. JACOBO mentioned the box came from MARTINEZ-Gonzalez vehicle. JACOBO also mentioned this deal was supposed to occur Wednesday February 14, 2024, where JACOBO was at MARTINEZ-Gonzalez's residence located at 6111 Sun Valley Drive, El Paso, Texas. JACOBO stated that the box that he held at the time of his arrest, was inside MARTINEZ-Gonzalez residence located on the couch on February 14, 2024.

During the interview of MARTINEZ-Gonzalez, MARTINEZ-Gonzalez told agents he knew the box contained narcotics and he brought the box from his residence located at 6111 Sun Valley Drive Trailer 113, El Paso, Texas. MARTINEZ-Gonzalez stated an unknown female delivered the box approximately 4 or 5 days prior. A search of MARTINEZ-Gonzalez phone revealed messages between MARTINEZ-Gonzalez and HERNANDEZ-Lopez, where they talk about the concealment of the illegal drugs while delivering them to the UC. A further search of MARTINEZ-Gonzalez cellphone revealed four videos of illegal immigrants stating they have made it to El Paso.

MARTINEZ-Gonzalez would not mention where the illegal immigrants were currently located. MARTINEZ-Gonzalez also told agents he was also involved in human trafficking.

Once the interviews were concluded, HERNANDEZ-Lopez told agents the illegal immigrants that were on MARTINEZ-Gonzalez phone were located inside the residence of MARTINEZ-GONZALEZ.

The facts of the investigation were presented to Assistant United States Attorney Kyle Myers, who accepted the case for prosecution in the Western District of Texas. Sergio Ivan HERNANDEZ-Lopez, Eddie Guillermo JACOBO and Hector Joel MARTINEZ-Gonzalez were transported to the El Paso County Detention Center to await their initial appearance.

Subsequently, Texas Department of Public Safety Special Agents assigned to the anti-human smuggling group obtained a state search warrant on 6111 Sun Valley Drive, Trailer 113, El Paso, Texas 79924. Subsequent to the search warrant DPS Agents located 4 illegal immigrants inside the residence that match the description of the photos on MARTINEZ-Gonzalez's phone.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation. I state that the following information is based on information provided to me by other agents, and it is true and correct to the best of my knowledge and belief.

  
DEA Special Agent Casey C. Thompson

SWORN to before me this February 20, 2023,

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United States Magistrate Judge Robert F. Castaneda